

# MEMO ENDORSED

April 29, 2020

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**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
United States District Court for the  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

**Re: Rusis et al v. International Business Machines Corp., Civil Action No. 1:18-cv-08434**

Dear Judge Caproni:

The parties jointly submit this letter to request a sixty-day adjournment of the Initial Pretrial Conference scheduled for 10 a.m. on Friday, May 1, 2020, to allow the parties to explore a possible resolution of this matter. The parties are in the process of scheduling a mediation to take place within the next 60 days and thus would like to postpone the imposition of deadlines during this time. If during this period, the parties conclude that a resolution is not achievable, the parties will promptly notify the Court. This is the second request to adjourn the Initial Pretrial Conference. The first request was necessitated by the unavailability of Defendant's counsel on the original date of the Conference.

Thank you in advance for your consideration.

Respectfully submitted,

/s/ Shannon Liss-Riordan

Shannon Liss-Riordan  
LICHTEL & LISS-RIORDAN, P.C.  
Attorneys for Plaintiffs

/s/ Matthew W. Lampe

Matthew W. Lampe  
JONES DAY  
Attorneys for Defendant

Application GRANTED. The IPTC is  
adjourned to **July 10, 2020, at 10:00 a.m.** The  
parties must submit a status letter and revised  
proposed CMP no later than **July 2, 2020**.

SO ORDERED.

  
4/29/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE